

August 10, 2011

The Honorable Julius Genachowski
Chairman, Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: *Connect America Fund; A National Broadband Plan for Our Future; Establishing Just and reasonable Rates for Local Exchange Carriers; High-Cost Universal Service Support; Developing a Unified Intercarrier Compensation Regime; Federal-State Joint Board on Universal Service; Lifeline and Link-Up; WC Docket Nos. 10-90, 07-135, 05-337, 03-109, CC Docket Nos. 01-92, 96-45, GN Docket No. 09-51, Notice of Proposed Rulemaking and Further Notice of Proposed Rulemaking, 26 FCC Rcd 4554 (2011)*

Dear Chairman Genachowski:

As a follow up to our letter dated January 18, 2011, we write to you today to express our support for near-term adoption and *simultaneous* implementation of the industry-wide universal service and intercarrier compensation reforms proposed in America's Broadband Connectivity Plan. This plan was filed on July 29, 2011, in response to the Commission's request for industry input on addressing the outdated and inextricably linked universal service and intercarrier compensation systems. In addition to reforming these two regimes, this aptly-named proposal will also achieve the goal articulated in the National Broadband Plan of ensuring broadband access throughout the country.

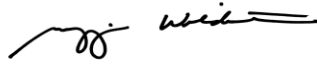
We believe that the time to act on comprehensive reform of both universal service and intercarrier compensation is now. The current universal service and intercarrier compensation systems are unstable and not sustainable. Any near-term reforms that significantly reduce implicit support under the intercarrier compensation system without creating new, meaningful opportunities for explicit universal service support only will make it more difficult for companies to extend and sustain broadband networks in high-cost areas. In addition, access to high-speed broadband has become an indispensable platform for economic growth and job creation, for addressing major national challenges like education, health care, energy and public safety, and for participation in this great democracy. By taking decisive action on all parts of the proposal simultaneously, the FCC will take a major step toward achieving the goal in the National Broadband Plan for universal broadband.

Achieving consensus on this formal proposal required compromise, perseverance, and a leap of faith by all involved. The careful balance that was ultimately achieved benefits consumers across the country, and furthers the goal of Congress and the FCC outlined in the National Broadband Plan. That is why we urge you to move forward expeditiously to adopt America's Broadband Connectivity Plan in full.

We look forward to working with you through this important process,



Glen F. Post, III
CEO and President
CenturyLink, Inc.



Maggie Wilderotter
Chairman and CEO
Frontier Communications



Jeff Gardner
President and CEO
Windstream

cc: Commissioner Michael J. Copps
Commissioner Robert M. McDowell
Commissioner Mignon Clyburn